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Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

RE: MM Docket No. 99-325

I am writing in response to the FCC's request for comments regarding the benefits of HD Radio and particularly the enhanced service the supplemental audio channel capacity (SAC) would provide our listeners here in the heartland.

As the only source of public radio for many citizens in our service area, KUMR believes the potential to provide more program streams and greater diversity in programming would greatly enhance public exposure to even more of what public radio has to offer.

KUMR is currently in the process of replacing its 30+ year old analog transmitter plant and looks forward to the enhancements it will provide listeners. The opportunity to further enhance KUMR's service with supplemental audio channel capability would open the door to simultaneous news, talk, music and entertainment programming as well as provide more choices for the audience. KUMR would do all in its power to embrace a digital upgrade in our service.

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KUMR strives to provide quality, in-depth programming to listeners in our area. Multiplexing of the digital audio signal enables us to provide programs to specific audiences that currently are not served. In some instances, language-specific programs serving populations of non-English speaking citizens might also be provided. KUMR believes the use of supplemental audio is integral to our public service mission and enables us to expand programming to meet listener needs that are either underserved or not served at all. As an example, there are many Asian-Americans in our area that would welcome programming delivered in a more familiar language.

In my 19 years here at KUMR, on many occasions management and staff have discussed the desire and need for a second program stream to broaden our service to the community. The cost effectiveness of the supplemental audio channel capability would make this possible.

Currently, KUMR provides both locally produced and national programming that is used in both public school classrooms and to home-schooled children. The SAC capability would provide more opportunities to provide and expand this programming to educators and the general listening audience.

In conclusion, the use of HD Radio technology to offer supplemental audio channels, would greatly enhance KUMR's mission in providing the highest quality service to our audience. In my opinion, this would further the FCC's goals in providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. We are thankful for any FCC efforts to protect and enhance our ability to serve that

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programming mission. KUMR also believes the potential use of SAC technology would provide opportunities to expand membership and other revenue streams to both support and enhance our public mission.

Thank you for your consideration in these matters.

Sincerely,

Jim Sigler

KUMR General Manager